



10 June 09

ATTN Special Permits
Comment on 14860-N

There are some transportation regulations that are going to impact the health and welfare of the citizens who live in rural Alaska.

FAA wants to regulate the transportation, in commerce, of cylinders of compressed oxygen and oxidizing gases with a rigid flame resistant, thermal outer packaging by aircraft. This regulation is effective October 1, 2009. This rigid outer packaging requirement does not exist for other modes of transportation.

Some communities in the State of Alaska receive their oxygen supply in cylinders via vessel or surface transportation. But for a majority of the state's villages – supplies are only available year round by air mode. Well over 1,000 oxygen cylinders are shipped every month throughout the state of Alaska from Anchorage. The northern terminus of the road and rail system is in Fairbanks. Additional cylinders are shipped by air to the communities that utilize Fairbanks as their hub. Some of these cylinders go to hospitals located in the larger outlying communities which are in turn, air shipped again, to those village clinics and for patient use in their homes.

Even if non-specification outer packaging was permitted, the size and weight of the crate would prevent many air carriers from being able to transport the large cylinders on their small aircraft. Most of the rural airstrips are very short and can only accommodate smaller, single and twin engine propeller aircraft. For the larger aircraft operators, the bulk of the outer packagings will have an impact on the amount of cylinders that can be carried on each aircraft.

The new rule, if enacted, would either make the availability of compressed oxygen significantly reduced or so expensive as to make its use impractical in communities who rely on air transportation. The lack of compressed oxygen for veterinary and building trades to the thousands of residents in these communities is problematic, but it is the lack of oxygen for health care that raises this problem to life threatening.

This cost must be weighed against the potential benefit of the rule in question. Carriers and shippers are not aware of even one report of an incident involving compressed oxygen and oxidizing gas cylinders in commerce, despite the many thousands and thousands shipped over the years. Despite the large temperature variations and other conditions incident to transportation within the State of Alaska, they have a perfect track record.

Northern Air Cargo fully supports the application for special permit 14860-N. Relief from the requirement of the flame and heat resistant rigid outer packaging when other means of transportation is impracticable is reasonable. As an air carrier, we do not have any reservations about continued shipping of these compressed oxygen and oxidizing gas cylinders without this rigid outer packaging.

Sincerely

A handwritten signature in black ink, appearing to read "Mark Smith", is written over a horizontal line.

Mark Smith

Northern Air Cargo / Hazardous Materials